

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

This document relates to:  
*All Actions*

No. 19-md-2875-RBK-KW

Honorable Robert Kugler  
Magistrate Karen Williams  
Special Master Thomas Vanaskie

**PLAINTIFFS' NOTICE OF MOTION  
FOR SANCTIONS FOR DEFENDANT  
ZHP'S OBSTRUCTION AND FAILURE  
TO PROVIDE RESPONSIVE  
DEPOSITION TESTIMONY**

To: Seth A. Goldberg  
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PLEASE TAKE NOTICE that on a date as soon as June 21, 2021, or as soon thereafter as counsel may be heard, Plaintiffs, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for a MOTION for sanctions for Defendant ZHP's obstruction and failure to provide responsive deposition testimony. Plaintiffs note that they did not file their supporting brief on ECF because ZHP has over designated the deposition transcripts of its witnesses as confidential. However, Plaintiffs will email the brief to the Court and Defendants for their review.

Dated: May 27, 2021

Respectfully Submitted,

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